

EXHIBIT 6

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION

4 * * * * *

5 IN RE: ETHICON, INC.)
6 PELVIC REPAIR SYSTEMS) MDL NO. 2327
7 PRODUCTS LIABILITY)
8 LITIGATION)
9 _____
10 DIANNE M. BELLEW,)
11) Plaintiff,
12) Case No.
13) 13-cv-22473
14) vs.
15) 13-cv-22473
16 ETHICON, INC., et al.,)
17)
18 Defendants.)
19 _____)

20)
21)
22)
23)
24)
25)
MONDAY, JUNE 30, 2014

Video Deposition of CAROL DEHASSE, M.D.,
VOLUME II, held at Ellie Towne Community Center,
1660 West Ruthrauff Road, Tucson, Arizona,
commencing at 9:08 a.m., on the above date,
before Lisa Moskowitz, California Certified
Shorthand Reporter No. 10816, RPR, CLR.

GOLKOW TECHNOLOGIES, INC.
877.370.3377 ph|917.591.5672 fax
Deps@golkow.com

1 APPEARANCES:

2

3 AYLSTOCK, WITKIN, KREIS & OVERHOLTZ, PLLC

BY: DANIEL THORNBURGH, ESQUIRE

4 dthornburgh@awkolaw.com

17 East Main Street, Suite 200

5 Pensacola, Florida 32502

(850) 202-1010

6

Counsel for Plaintiff

7

8

IRWIN FRITCHIE URQUHART & MOORE, LLC

9 BY: KIM E. MOORE, ESQUIRE

kmoore@irwinllc.com

10 400 Poydras Street, Suite 2700

New Orleans, Louisiana 70130

11 (504) 310-2108

12 Counsel for Defendants

13

ALSO PRESENT:

14

JENNIFER ALEXANDER

15 COREY SMITH

16

17 VIDEOGRAPHER:

18 JOHN MANISCALCO,

Golkow Technologies, Inc.

19

- - -

20

21

22

23

24

25

1 MR. THORNBURGH: Objection.

2 THE WITNESS: I think. I'm not
3 sure I understand.

4 BY MS. MOORE:

5 Q. Do you have any independent
6 recollection of things dealing with
7 Mrs. Bellew that are not captured in your
8 records?

9 A. That are not captured, no.

10 Q. You mentioned -- when I arrived
11 here today, you were meeting with
12 plaintiff's counsel.

13 A. Uh-huh.

14 Q. Had that been arranged before this
15 morning, the meeting?

16 A. This morning to meet with him?

17 Q. Yes.

18 A. It was arranged on Friday.

19 Q. Okay. And how was that arranged?

20 A. By e-mail.

21 Q. Okay. Tell me about that.

22 A. Just asking if we could meet prior
23 to the beginning.

24 Q. So who asked -- you received a
25 request for an ex parte meeting with

1 plaintiff's counsel?

2 A. Is ex parte mean outside of --

3 Q. Just that side.

4 A. Yes.

5 Q. You just met with the plaintiff's
6 side?

7 A. Yes.

8 Q. And what was the -- do you have the
9 e-mail with you today?

10 A. Yeah.

11 Q. May I see it?

12 A. Yes.

13 Q. I didn't mean to ask -- do you want
14 to just read it into the record?

15 A. Okay. This is through the office
16 supervisor.

17 Q. Okay. And the request?

18 A. The request from Christy Hurt, you
19 want me to read the e-mail?

20 Q. Yes.

21 A. "Liberty, I reached out to you by
22 telephone" -- to Liberty Bruss, which is our
23 office supervisor -- "regarding a meeting
24 Sunday evening. If you can let me know by
25 tomorrow, that would be great. Also, the

1 defense attorneys have asked to start the
2 deposition at 8 a.m. on Monday. Would this
3 work for Dr. Dehasse? Please let me know as
4 soon as possible; so I can relay the
5 information. Thank you."

6 And from Liberty to Christy, "If he
7 can meet with Dr. Dehasse 8:00 a.m. Monday
8 morning, that would be great. The community
9 center is not open until 9:00, but we do
10 have a clinic at the same location they can
11 meet at. Ellie Towne Community Health
12 Center."

13 Is that what you wanted to see?

14 Q. Yes. And so you made arrangements
15 to meet with Mr. Thornburgh this morning?

16 A. Yes.

17 Q. In advance of the deposition?

18 A. Yes.

19 Q. And do you have any other e-mails
20 specifying what Mr. Thornburgh or anyone
21 from his office requested to discuss with
22 you?

23 A. No, just a meeting.

24 Q. Okay. Let's talk about this
25 meeting today.

1 A. Okay.

2 Q. What was the purpose of the
3 meeting?

4 A. I don't know. Just wanted to meet
5 an hour before.

6 Q. Okay. So --

7 A. Maybe a recap of last deposition
8 six months ago.

9 Q. Okay. And what did you discuss
10 with Mr. Thornburgh this morning?

11 A. Basically the IFU. Is that what
12 it's called? IFU? And going over the
13 inflammatory process and the scarring
14 process. That was the main level of --

15 Q. Okay. So basically the IFU and
16 going over the inflammatory process?

17 A. Uh-huh.

18 Q. And when you say "basically the
19 IFU," did he point out the language that he
20 focused on during your deposition this
21 morning?

22 A. The highlighted area?

23 Q. Yes, ma'am.

24 A. Yes.

25 Q. And he told you that was an

1 important area that he was going to ask you
2 about?

3 A. Yes.

4 Q. You also talked about inflammation
5 and plaintiff's theories on inflammation?

6 MR. THORNBURGH: Objection.

7 THE WITNESS: Theories? I
8 don't know about theories. I don't know
9 what you mean.

10 BY MS. MOORE:

11 Q. Mr. Thornburgh talked to you about
12 inflammation?

13 A. Yes.

14 Q. And from his perspective, what he
15 thought the documents showed and what the
16 company knew about inflammation?

17 MR. THORNBURGH: Objection.

18 THE WITNESS: Yes.

19 BY MS. MOORE:

20 Q. Did you ask -- at any time, did you
21 ask, "Well, what does the other side have to
22 say about this information," or at that
23 point, it was just listening to what
24 Mr. Thornburgh had to say?

25 MR. THORNBURGH: Objection.